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## BEFORE THE ARIZONA CORPORATION COMMISSION

2003 SEP 26 P 4: 38

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SEP 29 2003

Z CORPORATION COMMISSION  
DIRECTOR OF UTILITIESARIZONA CORPORATION COMMISSION  
DIRECTOR OF UTILITIES

1  
2 MARC SPITZER  
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3 WILLIAM MUNDELL  
Commissioner  
4 JEFF HATCH-MILLER  
Commissioner  
5 MIKE GLEASON  
Commissioner

6  
7 IN THE MATTER OF ILEC UNBUNDLING  
OBLIGATIONS AS A RESULT OF THE  
8 FEDERAL TRIENNIAL REVIEW ORDER.

DOCKET NO. T-00000A-03-0369

**SUPPLEMENTAL COMMENTS OF  
QWEST CORPORATION**

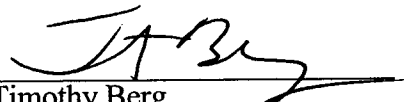
9 Qwest Corporation ("Qwest") hereby submits these Supplemental Comments in response to  
10 the Procedural Order issued June 24, 2003. In the Procedural Order, the Administrative Law Judge  
11 seeks comment on issues relating to the Federal Communications Commission's ("FCC") Triennial  
12 Review Order ("Order"). In the Procedural Order, the Commission posed several questions relating  
13 to the issues it may need to address as a result of the Order. Qwest filed comments in response to  
14 the Procedural Order on September 10, 2003. In those comments Qwest stated that it was in the  
15 process of preparing a set of standardized data requests that it would propose the Commission use in  
16 this proceeding. Qwest has completed that initial set of proposed data requests and attaches them to  
17 these Supplemental Comments as Attachment A. Qwest is continuing to analyze the FCC Order  
18 and may suggest additional or different data requests as that analysis progresses.

19 It is essential that all telecommunications providers (CLECs, ILECs, IXC's, cable providers,  
20 wholesale providers, VoIP providers and wireless providers included) in Arizona provide this  
21 information because they are in possession of much of the factual information identified by the FCC  
22 as relevant for state Commission. Pursuant to the Commission's investigatory powers, responses to  
23 these data requests should be mandatory and should require CLECs, cable providers and wireless  
24 providers to provide the factual information necessary to address the impairment issue, the  
25 alternatives to unbundled ILEC facilities, and other relevant factors to be considered by the  
26 Commission when making its decisions. To ensure that it promptly receives the information it

1 needs, the Commission should explicitly state in any order or orders issued by the Commission that  
2 the responses to the questions are due within 10 business days and that the responses must be full  
3 and complete.

4 DATED this 26<sup>th</sup> day of September, 2003.

5 FENNEMORE CRAIG, P.C.

6  
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11 *Attorneys for Qwest Corporation*

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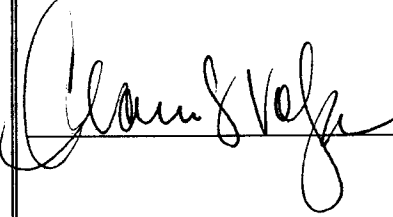
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1 **ATTACHMENT A**

2 **Discovery Requests for Triennial Review**  
3 **Proceedings**

4 **STATE OF COMPETITION**

5  
6 1. Please list each LATA in [state] in which [company] provides or has provided local  
7 telecommunications services since passage of the Telecommunications Act of 1996.  
8

9 2. Please list each wire center in [state] in which [company] provides or has provided local  
10 telecommunications services since passage of the Telecommunications Act of 1996.  
11

12 3. For each LATA and wire center identified in response to requests 1 and 2, please  
13 identify:

14 a. How many local telecommunications lines [company] has in service? Please  
15 provide this information by:

16 i. Switched Services

17 (a) POTS;

18 (b) Centrex;

19 (c) ISDN BASIC;

20 (d) ISDN Primary;

21 (e) PBX Trunk (Analog only);

22 (f) Switched Services riding a DS1 pipe (to a Digital PBX, ISDN  
23 PRIMARY, etc; Count by channel);

24 (g) Other switched services;

25 (h) Total switched services.  
26

1           ii.    Non-Switched Services (include facilities, not voice grade equivalents;  
2               exclude interoffice facilities; count each terminating leg of facility  
3               separately):

4               (a) DS0 Services (including both Analog & Digital);

5               (b) DS1 Services;

6               (c) DS3 Services;

7               (d) OC-3 Services;

8               (e) OC-12 Services;

9               (f) OC-48 Services;

10              (g) Other;

11              (h) Total Non-Switched Services.

12           b.    What percentage of the lines (by line types defined above) identified in response  
13               to (a) are

14              i.    UNE-P Business;

15              ii.   UNE-P Residence;

16              iii.   UNE-L Business;

17              iv.    UNE-L Residence;

18              v.    Business lines provided using the [company]'s own loop facilities and  
19               another party's dial tone (switching);

20              vi.    Business lines provided using [company]'s own loop facilities and own  
21               dial tone;

22              vii.   Business lines using a third party's loop facilities and [company]'s own  
23               dial tone;

24              viii.   Residential lines provided using the company's own loop facilities and  
25               another party's dial tone;

26              ix.    Residential lines provided using the [company]'s own loop facilities and  
              own dial tone;

- 1                   x.     Residential lines using a third party's loop facilities and the [company]'s  
2                         own dial tone;
- 3                   xi.    For any residential and business lines served in any manner not listed  
4                         above, in what manner are those lines served?
- 5                   c.     Please provide the number of end-user customer locations served by DS1 and  
6                         above capacity circuits and below DS1 capacity circuits using [company]'s self-  
7                         provided switching. Please identify each such customer location by address. In  
8                         the Triennial Review Order, the FCC states "if a customer has purchased services  
9                         from the competitive carrier that require a DS1 or above loop, it is economically  
10                        feasible to digitize the traffic and aggregate the customer's voice loops at the  
11                        customer's premises and put them onto a high-capacity circuit." [para 451]  
12                        Please state if [firm] disputes this finding and, if it does, explain why and describe  
13                        all facts that support your positions. In addition, if [company] disputes this  
14                        finding, provide all documents you rely upon to support your position.

15                   Please produce all documents that support or substantiate the information provided in any of  
16                         your responses to this request.

17                   4.     Please provide the number of UNE-P orders that [company] has placed with any local  
18                         exchange carriers in [state] over the past 12 months.

19                   5.     Please provide the number of UNE-P orders that [company] expects to place with any  
20                         local exchange carriers in [state] in the next 12 months, the next 24 months, and the next 36  
21                         months. Please produce all documents that reflect or relate to these forecasts.

22                   6.     Please provide the number of UNE-L orders that [company] has placed with any local  
23                         exchange carriers in [state] over the past 12 months.

24                   7.     Please provide the number of UNE-L orders that [company] expects to place with any  
25                         local exchange carriers in [state] in the next 12 months, the next 24 months, and the next 36  
26                         months. Please produce all documents that reflect or relate to these forecasts.

1 8. If the state commission determines that competitive carriers are not impaired without  
2 access to switching in the mass market, provide projections of the number of UNE-L orders  
3 and/or conversions you would anticipate over the first 12 months after the effective date of the  
4 decision, the second 12 months, and the third 12 months.  
5

6 9. Please state whether [company] is providing any intermodal services in [state] to compete  
7 with services offered by Qwest, including cable, wireless, and Voice Over Internet ("VOIP"). If  
8 [company] is using any of these services, please identify the geographic areas in [state] where it  
9 is offering these services, and specify which service(s) is being offered in which areas. In  
10 addition, identify the number of end-user customers you are serving using such intermodal  
11 facilities by wire center.  
12

13 10. Please list all areas in [state] in which [company] is certified to provide local exchange  
14 service.  
15

16 11. Please list all areas in [state] in which [company] has engaged in any form of advertising  
17 or marketing of local exchange services within the past 12 months. Please produce all  
18 documents that reflect or relate to such advertisements and marketing efforts, including copies of  
19 all advertisements and documents describing marketing campaigns.  
20

21 12. Please state whether [company] has any business plans to begin providing local exchange  
22 service in areas of [state] where it does not currently provide such service. If [company] has  
23 such plans, please identify the new areas where it intends to provide service, and produce all  
24 documents that refer or relate to [company]'s plans to expand into these new areas.  
25  
26



## CLEC REVENUES AND COSTS

13. Please provide the average total revenue per line that [company] has received from its residential customers within [state] in each of the past two years. The average revenue per line should include revenues associated with the basic retail price charged to residential customers, vertical features, universal service payments, access charges, subscriber line charges, toll, long distance, local number portability, data, video, service to Internet service providers, international calling, and line revenues derived from any other sources. Please provide both the total average revenue per line and a breakdown of the amount of revenue for each category of revenue that comprises the total. In addition, please list intraLATA and interLATA revenues separately. Please produce all documents that reflect, refer or relate to the information provided in your response to this request.

14. Please provide the average total revenue per line that [company] has received from its business customers within [state] in each of the past two years. The average revenue per line should include revenues associated with the basic retail price charged to business customers, vertical features, universal service payments, access charges, subscriber line charges, toll, long distance, local number portability, data, international calling, and line revenues derived from any other sources. Please provide both the total average revenue per line and a breakdown of the amount of revenue for each category of revenue that comprises the total. In addition, please list intraLATA and interLATA revenues separately. If revenues differ depending on the type of business customer (small vs. large), please provide the total revenues and the breakdown of revenues by type of business customer. Please provide the information by POTS, DS0, DS1,

1 DS3, OC-3, OC-12, OC-48, and any other relevant categories. Please produce all documents that  
2 reflect, refer or relate to the information provided in your response to this request.  
3

4 15. Please explain how [company] defines its business customer segments and provide any  
5 documents that reflect this definition or the criteria [company] uses to segment or classify  
6 business customers into distinct customer groups. Please produce all documents that reflect,  
7 refer or relate to the information provided in your response to this request.  
8

9 16. Please provide the average total revenue per line that [company] has received from its  
10 entire customer base (residence and business combined) within [state] in each of the past two  
11 years. The average revenue per line should include revenues associated with the basic retail  
12 price charged to residential and business customers, vertical features, universal service payments,  
13 access charges, subscriber line charges, toll, long distance, data, international calling, local  
14 number portability, and line revenues derived from any other sources. Please provide both the  
15 total average revenue per line and a breakdown of the amount of revenue for each category of  
16 revenue that comprises the total. In addition, please list intraLATA and interLATA revenues  
17 separately. Please produce all documents that reflect, refer or relate to the information provided  
18 in your response to this request.  
19  
20

21 17. Please provide the average total cost per line that [company] has incurred to provision  
22 lines used to serve residential customers within [state] for each of the past two years for the  
23 following categories: (1) service provided by UNE-P, (2) service provided by UNE-L, and (3)  
24 service provided using [company]'s own facilities. Please provide a breakdown of each cost  
25 component (e.g., investment-related costs, network operations, maintenance, and SG&L) that is  
26

1 part of the average total cost per line, identifying the type and amount of each cost. Please  
2 produce all documents that reflect, refer or relate to the information provided in your response to  
3 this request.  
4

5 18. Please provide the average total cost per line that [company] has incurred for lines used  
6 to serve business customers within [state] for each of the past two years, and in addition to a total  
7 average, please provide separate averages for service provided through UNE-P, UNE-L, and  
8 with [company]'s own facilities. Please provide a breakdown of each cost component (*e.g.*,  
9 investment-related costs, network operations, maintenance, and SG&L) that is part of the  
10 average total cost per line, identifying the type and amount of each cost. If costs differ  
11 depending on the type of business customer (small vs. large), please provide the total cost and  
12 the breakdown of costs by type of business customer. Please identify how your company defines  
13 "small" and "large" business customers. Please produce all documents that reflect, refer or relate  
14 to the information provided in your response to this request.  
15  
16

17 19. Please provide the average total cost per line that [company] has incurred to provision all  
18 the lines serving its entire customer base (residence and business combined) within [state] in  
19 each of the past two years, and in addition to a total average, please provide separate averages for  
20 service provided through UNE-P, UNE-L, and with [company]'s own facilities. Please provide a  
21 breakdown of each cost component (*e.g.*, investment-related costs, network operations,  
22 maintenance, and SG&L) that is part of the average total cost per line, identifying the type and  
23 amount of each cost. Please produce all documents that reflect, refer or relate to the information  
24 provided in your response to this request.  
25  
26

1 20. Does [company] currently order high capacity UNE-P circuits such as UNE-P-DSS or  
2 UNE-P-PRI from Qwest or any other ILEC? If yes, identify the wire centers from which  
3 [company] orders such circuits and the number of such circuits [company] currently has in  
4 service. If yes, describe [company's] rationale for ordering such circuits. Please describe and  
5 itemize all costs that [company] would incur to connect its own facilities to the wire centers in  
6 question.  
7

8 21. Please list each switch that [company] has purchased, leased or upgraded at any time to  
9 provide local exchange service in [state], and provide the following information for each switch:  
10 (1) the type of switch; (2) the date of purchase; (3) the location; (4) the initial installed number of  
11 lines and trunks; (5) the initial price paid for the switch; (6) the EF&I (engineering, furnish, and  
12 install) costs of the switch (if separate from the price paid); (7) a description of any additions to  
13 the switch; (8) the price paid for each addition to each switch; (9) the amount of increased  
14 capacity provided by each addition; and (10) the price paid for each switch operating software  
15 upgrade. Please produce all documents that reflect, refer or relate to the information provided in  
16 your response to this request.  
17  
18

19 22. Please provide complete copies of [company]'s switching vendor contracts, including  
20 amendments, pricing lists, discount schedules, etc. If any redactions are required, please explain  
21 why and identify the type of information redacted.  
22

23 23. Please state whether [company] has purchased switching (wholesale or retail) in [state]  
24 from any entity other than Qwest. If [company] has purchased switching from any entity other  
25 than Qwest, please identify all such entities and identify the locations of their switches that are  
26

1 providing the switching and the locations of the customers served by [company] via those  
2 switches.

3  
4 24. Please state whether [company] is using any partitioned switches in [state] that it owns,  
5 leases, or otherwise controls jointly with another carrier(s) and whether you share a CLLI with  
6 another carrier for the switch. Please identify the locations of any such switches and the  
7 identities of the other carriers and describe the capacity and capability of the partition that  
8 [company] owns, leases, or otherwise controls. As used in this request, "partitioned" means  
9 switches shared by different entities.

10  
11 25. Identify every switch for which you share a CLLI code with another carrier and, for each  
12 switch, explain why you are sharing the CLLI code.

13  
14 26. For [company's] business operation in [state] that provides local exchange service, please  
15 provide the ratio of general and administrative expenses to revenues that [company] has had in  
16 each of the past two years. In providing this ratio, please exclude any extraordinary items from  
17 both the numerator and the denominator, and identify any extraordinary items, including the  
18 amounts, that are excluded. Please produce all documents and data relied upon to calculate these  
19 ratios, including data that will permit independent verification of the ratio.

20  
21 27. For [company's] operation in [state] that provides local exchange service, please provide  
22 the ratio of all types of marketing costs and revenue offsets to revenues (excluding extraordinary  
23 items from both the numerator and denominator), including for the following categories.

24  
25 a. Advertising;

1           b.       Promotional discounts;

2  
3           c.       Sales commissions;

4           d.       Billing and collection;

5  
6           e.       Customer care (other than the above).

7           Please produce all documents and data relied upon to calculate these ratios, including  
8 data that will permit independent verification of the ratio. In addition, please provide the total  
9 annual amount of the costs for each category listed above for the past two years.  
10

11 28.     Does [company] incur any customer acquisition costs in addition to those listed above in  
12 Request 27 (excluding any charges paid to ILECs) to set up a new customer account and to  
13 establish service? If so, please identify all such costs and provide the ratio they represent in  
14 relation to revenues. Please provide the amount of all such costs, by individual cost categories,  
15 for each of the past two years.  
16

17 29.     For [company's] business operation in [state] that provides local exchange service, what  
18 is the allowance for uncollectible revenues as a fraction of annual revenues? In providing this  
19 response, please separate any losses (or potential losses) associated with the bankruptcies of  
20 WorldCom, Global Crossing, and XO Communications from other bad debt. Please produce all  
21 documents that reflect, refer or relate to the information provided in your response to this  
22 request.  
23

24 30.     For [company's] business operation in [state] that provides local exchange service, what  
25 is the ratio of taxes (other than income taxes) to the value of the company's net plant? Please  
26

1 produce all documents that reflect, refer or relate to the calculation of this ratio, and produce the  
2 data that will permit independent verification of the ratio.

3  
4 31. Please provide copies of any studies or analyses that [company] has conducted that  
5 evaluate or refer to the costs of collocation in [state]. In addition, please produce all documents  
6 and data that reflect, refer or relate to the collocation costs that [company] has incurred in [state].

7  
8 32. Please identify all operational support systems ("OSSs") that [company] uses to support  
9 its business operation in [state] that provides local exchange service.

10 33. For each OSS included in your response to Request No. 32, please:

- 11  
12 a. Describe the functions performed by the OSS;
- 13  
14 b. Provide the number of local telecommunications lines that have been served by  
the OSS each year;
- 15  
16 c. Provide the total cost of each OSS, including:
- 17 i. The initial cost of the OSS;
- 18 ii. The average upgrade cost per year for the OSS; and
- 19 iii. The annual cost for each year in which [company] has used the OSS.

20 Please provide all documents that reflect or relate to the information you provide in  
21 response to this request.

22  
23 34. For each OSS listed in response to Request No. 32, please state whether [company] uses  
24 the OSS to support services other than local telecommunications service. Please identify any  
25 such services.

1 35. Of the lines that [company] serves in [state] using UNE-Ls, please:

2 a. State the percentage of these lines that [company] serves from ILEC offices in  
3 which [company] is collocated;

4 b. State the percentage of these lines that are connected to DLCs in collocation  
5 space.

6  
7 c. State the percentage of these lines that are connected to DLCs in collocation  
8 space.

9 36. For each Qwest office in [state] which [company] uses its own DLC equipment, please  
10 provide:

11 a. The number of lines served;

12 b. The number of lines installed;

13 c. The concentration ratio; and

14 d. The cost of the equipment, fully installed.  
15

16 Please produce all documents that reflect or relate to the information you provide in your  
17 response to this request, including any documents that reflect the prices [company] has paid for  
18 DLC equipment.  
19

20 37. Please describe the pricing structure that governs [company's] purchases of DLC  
21 equipment, including whether [company's] purchases this equipment on an EF&I basis, pre-  
22 wired, or pursuant to any other special specifications.  
23

24 38. Please identify the monthly churn rate [company] has experienced for local exchange  
25 customers in each month in which it has provided local exchange service in the [state] market.  
26



1 In answering this request, you should calculate the churn rate based upon the number of lines lost  
2 each year divided by the average number of lines in service that year. In calculating churn, do  
3 not include customers who move but stay with the company.  
4

5 39. In connection with [company's] churn rates in [state] in each of the past two years for  
6 local exchange customers, of the total customers that have left [company], please identify the  
7 percentage that have left within one month of signing up for service, within two months of  
8 signing up for service, within three months of signing up for service, and within six months of  
9 signing up for service. Please produce all documents and data that reflect or relate to the  
10 information you provide in response to this request.  
11

12 40. Please produce all documents that reflect, refer, or relate to the churn rates for local  
13 exchange customers that [company] has experienced in [state].  
14

15 41. Please provide all documents that summarize or otherwise reflect the financial results of  
16 [company's] CLEC operations in [state] in each of the past two years.  
17

### 18 CLEC RATE PLAN OFFERINGS

19  
20 42. Please identify all rate plans that [company] offers in [state], and list all components  
21 (including vertical features) of the rate plans that [company] offers to businesses and all the  
22 components of the rate plans that [company] offers to residential customers. In addition, please  
23 produce all documents that describe the rate plans [company] offers in [state].  
24

25 43. Please identify the percentage of [company's] revenues from local exchange customers in  
26 [state] that are derived from flat rate plans that do not include incremental charges for domestic

1 long distance calls. Provide the percentage of total local exchange lines in [state] that are  
2 provided to the customer pursuant to a flat rate plan that does not include incremental charges for  
3 long distance calls. Please produce all documents that reflect, refer or relate to the information  
4 you provide in response to this request.  
5

6 44. Please provide the average long-distance per minute usage in [state] of [company's] local  
7 exchange customers for whom [company] is also the long-distance carrier using the following  
8 breakdown:  
9

10 a. Local exchange customers using flat-rate plans that do not include incremental  
11 charges for domestic long-distance calls; and

12 b. All other CLEC customers.

13 Please produce all documents that reflect, refer, or relate to the information you provide  
14 in response to this request.  
15

16 45. Please identify the percentage of [company's] switched minutes in [state] that are directed  
17 to Internet service providers. Please produce all documents that reflect, refer or relate to the  
18 information you provide in your response to this request.  
19

#### 20 CLEC SWITCHES

21  
22 46. Please identify all switches owned or controlled by [company] that are being used in  
23 [state] to provide service to customers served by facilities at or above the DS-1 level. For each  
24 switch, please state the number and percentage of customers that are being served by DS-1 and  
25 above facilities that are self-provided by [company] and are not leased from another carrier.  
26

1 47. Please access website <http://www.TRAinfo.com> showing publicly available  
2 specifications from the LERG Routing Guide of all central office switches currently in place in  
3 [state]. Please state whether the information in the LERG is current and accurate for the  
4 switches that [company] owns, operates, controls, maintains, or from which you lease dial tone  
5 or trunking functionality/capacity. If any of the information is not accurate, please identify the  
6 inaccurate information and provide corrected information, including any additions, deletions or  
7 changes. As part of your review of the information in the LERG, please state whether the CLLI  
8 code is accurate for each switch that [company] owns, operates, controls, maintains, or from  
9 which you lease dial tone or trunking functionality/capacity. In addition, please state whether the  
10 LERG definition of the function of each switch (i.e., tandem, end office, etc.) is accurate.  
11

12  
13 48. For each switch that [company] operates, controls, maintains, or from which you lease  
14 dial tone or trunking functionality/capacity within [state], please report (in Excel spreadsheet  
15 format) whether the switch is currently providing switching for local voice grade services,  
16 tandem switching<sup>1</sup> for voice calls, or both. In addition, for each switch, please provide traffic  
17 volumes, expressed in minutes of use, for year 2002 for local traffic and tandem traffic. If these  
18 data are not available for year 2002, please provide the information for the most recent 12-month  
19 period for which the data are available. Provide all documents that reflect, refer or relate to the  
20 information you provide in response to this request. In addition, please provide the following  
21 information for each switch:  
22

- 23 a. Switch type;  
24 b. The generic (feature package) loaded in the switch;  
25

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26 <sup>1</sup> Tandem switching is defined as switching of telephone traffic between two subtending end offices.

- 1 c. Current number of equipped lines in the switch;
- 2 d. The current number of equipped trunks in the switch;
- 3
- 4 e. 2001 and 2002 line growth for the switch; and
- 5 f. 2001 and 2002 trunk growth for the switch.
- 6 49. For each switch that [company] owns operates, controls, maintains, or from which you
- 7 lease dial tone or trunking functionality/capacity within [state], please state (in Excel spreadsheet
- 8 format) if the switch is providing originating voice grade services for residential end-user
- 9 customers and/or small business customers (defined for this question as businesses with four DS-
- 10 0 lines or fewer). If so, please:
- 11
- 12 a. Identify the switch (by CLLI) and the LATA(s) served by each switch (the LATA in
- 13 which the switch providing the originating dial tone is physically located);
- 14
- 15 b. Identify the geographic scope over which [company] serves residential end-user
- 16 customers and/or small business customers with its own switch;
- 17
- 18 c. Number of originating business and residential customers served by this switch;
- 19
- 20 d. Provide the volume of such traffic (expressed in minutes of use) for the most recent
- 21 12-month period;
- 22
- 23 e. Identify the rate centers you are serving for originating traffic;
- 24
- 25 f. State the manner by which such traffic is transported to the switch (i.e., transport
- 26 purchased from a provider other than Qwest , transport purchased from Qwest, EELs or transport via facilities owned by your entity); and

1 g. If [company] is serving customers (as defined above) in one LATA in [state] using a  
2 switch located in another LATA (including a LATA in another state), please identify  
3 the LATA and state in which the switch is located and describe the means by which  
4 you transport traffic from the second LATA to the switch.

5 50. For each switch that [company] owns or controls within [state], please state (in Excel  
6 spreadsheet format) if the switch is providing services to end-user customers with five DS-0 lines  
7 or more (including DS-1 facilities and above.) If so, please:

- 8
- 9 a. identify the switch (by CLLI) and the LATA's served by each switch;
- 10
- 11 b. identify the geographic scope over which [company] serves such end-user customers  
12 with its own switch;
- 13
- 14 c. provide the volume of such traffic (expressed in minutes of use) for the most recent  
15 12-month period;
- 16
- 17 d. state the manner in which such traffic is transported to the switch (i.e., transport  
18 purchased from a provider other than Qwest, transport purchased from Qwest, EELs,  
or transport via facilities owned by your entity; and
- 19
- 20 e. If [company] is serving these end-user customers using DS-1 and above facilities in  
21 one LATA in [state] using a switch located in a different LATA (including a LATA  
22 in another state), please identify the state in which the switch is located and describe  
23 the means by which you transport traffic from the second LATA to the switch.

24 51. For each switch that [company] owns, operates, controls, maintains, or from which you  
25 lease dial tone or trunking functionality/capacity within [state], please report (in Excel  
26 spreadsheet format) the level of traffic supported by that switch relative to the installed capacity  
of the switch expressed as a percentage (i.e., number of CCS at average busy hour divided by  
installed CCS capacity of the switch). In addition, please provide:

- a. For each switch, the percentage change in that value over the most recent 12-  
month period; and

- b. For each switch, a statement of whether the local switching capacity of the switch can be expanded through modular software and hardware additions. If you assert any obstacles to expansion, please identify and explain all such obstacles.

Sample Response Form			
Switch CLLI Code	(A) Average Busy Hour CCS (August 2003)	% Change 8/2002 to 8/2003	Switch expandable beyond current capacity via modular hardware? (y/n and reason)

52. For each voice grade switch in [state] that [company] owns operates, controls, maintains, or from which you lease dial tone or trunking functionality/capacity, please provide (in Excel spreadsheet format), the number of in-service telephone numbers ported from Qwest wire centers, listing each wire center, as well as the total number of all in-service telephone numbers active in each switch as of March 2003. (NOTE: if information regarding Qwest wire center from which numbers were ported is not available to you, simply provide the data for each switch as identified by its CLLI code).

Sample Response Form				
		(A)	(B)	(C)
Switch CLLI Code	Qwest Wire Center	Total in-service telephone numbers ported from Qwest as of March 2003	Total of all in- service telephone numbers as of March 2003	Percentage ported numbers in service to all in- service numbers (A/B)

53. For each switch in [state] that [company] owns or controls and that is providing switching for local voice services, please report (in Excel spreadsheet format): (a) whether the switch is serving mass market customers, enterprise customers or both; (b) whether the switch is serving

third-party local service providers; (c) the number of mass market switching ports; (d) the number of enterprise switching ports. In each instance, if the response is yes, please report the percentage of "in service" switching lines and trunks relative to installed lines and trunks in the switch.

Sample Response Form						
Switch CLLI Code	Switch serving mass markets, enterprise or both (M, E, B)	(if yes) % of switching ports in service	Switch serving 3 <sup>rd</sup> party local service providers? (y/n)	(if yes) % of switching ports in service	# of mass markets switching ports	# of enterprise switching ports

54. Please identify each entity, other than Qwest, from which [company] is purchasing or leasing interoffice tandem switching in [state]. For all such switching that [company] has obtained, please provide the tandem minutes of use obtained from each entity by trunk group, wire center, and tandem.

55. Please provide all fill factors or utilization rates for each switch in [state] for which [company] is responsible.

56. Please provide copies of any current contracts the [company] has with vendors for DLC equipment, including all pricing schedules, discounts, and amendments.

57. Please explain whether [company] pays for switching on a per line basis, and identify any switching components that [company] does not pay for on a per line basis.

58. If [company] offers intrastate switched access service to other carriers, please report your current switched access prices in [state].

59. If [company] offers intrastate-switched access service in [state], for each month since December 2001, please report (in Excel spreadsheet format) total revenue received for intrastate-switched access service.

60. If [company] offers intrastate long distance service to end users in [state], please report total intrastate long distance minutes of use and revenue for full years 2001 and 2002.

Sample Response Form				
State	2001 intrastate long distance minutes of use	2001 intrastate long distance revenue	2002 intrastate long distance minutes of use	2002 intrastate long distance revenue

61. What information does the CLEC require from the ILEC switch routing table? From the CLEC perspective, what does "access" imply, entail, or require beyond what is currently provided?

62. Does [company] believe that there are costs associated with converting or otherwise using a switch currently serving only enterprise customers to also serve mass market customers? If [company] believes that there are such switching costs, please identify all such costs and explain why it would be necessary to incur them to begin serving mass market customers. Produce any documents or data that support your response.

63. Describe all activities [company] must perform on its side of the network to complete an ILEC to CLEC hot cut, and identify all costs associated with these activities. Produce all data and documents that support your response. To the extent [company's] response would differ based on whether it performed a basic or a coordinated hot cut, please provide an itemization of the cost differences.



## UNBUNDLED LOOPS

64. Please report (in Excel spreadsheet format) the number of DS0 level (voice grade) residential and business lines in [state] that [company] serves by loops or lines for which a company other than Qwest provides switching dial tone functionality. In responding to this request, please separate by the categories set forth in the following table:

Sample Response Form						
State	Residential			Business		
	# DS0 lines served via your facilities	# DS0 lines served via <u>Qwest leased facilities</u>	# DS0 lines served via <u>leased from third party</u>	# DS0 lines served via your facilities	# DS0 lines served via <u>Qwest leased facilities</u>	# DS0 lines served via <u>leased from third party</u>

65. Please report (in Excel spreadsheet format) the number of DS1 level business lines in [state] served by unbundled loops for which [company] provides switching dial tone functionality. In responding to this request, please separate loop facilities by the categories set forth in the following table:

Sample Response Form							
State	Wire Center	Residential			Business		
		# DS0 lines served via your facilities	# DS0 lines served via <u>Qwest leased facilities</u>	# DS0 lines served via <u>leased from third party</u>	# DS0 lines served via your facilities	# DS0 lines served via <u>Qwest leased facilities</u>	# DS0 lines served via <u>leased from third party</u>

66. If [company] provides services operating at DS-1 and above (i.e., Digital Switched Service, Primary Rate Interface, etc) that terminate directly at end users' premises, please provide the city name, wire center and street address associated with each such termination. In addition, please:

- a. Report the service being provided at each such address (e.g., local switched service, high-speed data, video, etc) and capacity level;
- b. For services operating at DS-1 level or above, identify what category of facilities over which they are being provided (e.g., fiber, COAX, copper, radio, wireless, fixed wireless);
- c. For services operating at DS-1 level or above provided over network facilities obtained from another entity, please provide the name of the entity from which you obtain the facility and identify the type of facility used in providing the DS-1-level service to the end user.
- d. For each multi-tenant building in which [company] provides services operating at DS-1 level or above, state whether [company] is capable of serving all customers located in each building with its existing, installed facilities.
- e. If answer to (d) is no, whether customers could be served by adding electronics or other steps that do not require laying new cable.

**Sample Response Form**

State	City	Wire Center	Street Address	Type of service provided (local switched, data, video)	Category of facility over which service is provided (e.g., fiber, COAX, copper, radio,	Name of third party entity from which DS-1 level or above transport is	Type of DS-1 level or above transport facility obtained

					wireless, fixed wireless)	obtained	from third party (e.g., fiber, COAX, copper, radio, wireless, fixed wireless)
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67. Please provide the city name, wire center and street address of every end-user location in [state] to which [company] terminates dark fiber. For each such location, please indicate (a) the number of strands of fiber terminated to that street address, (b) the wire center or other location where that loop originates, (c) identity of any other premises through which the dark fiber is routed (d) whether that fiber is self-provisioned, obtained from Qwest, or obtained from a third party (and, if so, whom) (e) whether that fiber is owned outright, held as an indefeasible right of use ("IRU"), or has been obtained on some other basis (and, if so, what basis), and (f) what loop electronics are actually connected or available to be connected at the originating or terminating locations of those loops.

68. Please state whether [company] is using extended enhanced links ("EELs") in [state]. If so, identify each EEL, and for each such facility, explain or state (1) the services being provided over the EEL, (2) the number of customers served by the EEL, (3) whether the facility is being used in lieu of collocation, (4) the number of loops connected to the EEL, a descriptions of the type of loop facilities so connected, and the final demarcation point of each loop, and (5) whether the facility is being used as a functional private line.

1 69. Does [company] provide wholesale unbundled loops to any carriers in [state]? If so,  
2 please identify the carriers to which [company] has provided unbundled loops, the quantities of  
3 loops provided, and the dates that [company] provided the loops.

4  
5 70. Does [company] obtain or lease unbundled loops on a wholesale basis from any other  
6 carriers (other than Qwest) in [state]? If so, please identify all these carriers, the quantities of  
7 loops obtained, and when these loops were obtained or leased.

8  
9 71. Identify all customer locations (by address) in [state] to which [company] has deployed  
10 dark fiber loops.

## 11 **TRANSPORT**

12  
13 72. Please report (in Excel spreadsheet format) the speed and number of transport facilities  
14 (i.e., trunks) in [state] running between two Qwest central offices or between a Qwest central  
15 office and a CLEC central office served via network facilities owned or controlled by  
16 [company], or leased from an entity other than Qwest. For each such facility, please identify the  
17 A location, the Z location and any other premises through which the facility is routed. In  
18 addition, please break down this total number of facilities by wire center in which those trunks or  
19 EELs are located (NOTE: if data unavailable by wire center, please report the data by city).

20  
21 73. Please describe whether [company] has dark fiber transport facilities available to it. For  
22 each such dark fiber facility, provide the following information: (a) the number of strands of  
23 fiber existing in that route, (b) the A location of the fiber, the Z location of the fiber and an  
24 identification of all intermediate premises through which the fiber is routed; (c) whether that  
25 fiber is self-provisioned, obtained from Qwest, or obtained from a third party (and, if so, whom),  
26

(d) whether that fiber is owned outright, held as an indefeasible right of use ("IRU"), or has been obtained on some other basis (and, if so, what basis), (e) what electronics are actually connected or available to be connected at the originating and terminating locations of the facility and (f) whether [company] has self provisioned these electronics.

74. Please report (in Excel spreadsheet format) the number of transport trunks between any Qwest switch and a CLEC switch in [state] served via network facilities owned or controlled by [company], or leased from an entity other than Qwest. Please break down this total by wire center in which those terminations are located (NOTE: if data unavailable by wire center, please report the data by city).

75.

Sample Response Form			
State	Wire Center	# of trunks owned by your entity	# of trunks obtained from a non-Qwest entity

76. For [state], please provide a current mapping of all existing standard copper, COAX, fiber facilities (including points of access to these facilities), dark fiber and microwave routes owned, controlled, or leased by [company]. This mapping should contain a view at the state level showing major facility routes owned, leased or controlled by [company], and metropolitan area mapping showing specific facility routes within any and all metropolitan areas in which your network facilities are now located. In addition, please specify whether these facilities or dark or lit.

1 77. Please report available capacity of all standard copper, COAX, fiber facilities and  
2 microwave routes installed and owned by your [company] in [state].

3  
4 78. Please provide details (e.g., purchaser of capacity, specific routes involved, type of  
5 transport, number of circuits purchased) regarding any transport capacity on your network that is  
6 currently being leased, resold or otherwise provided to another telecommunications provider.

7  
8 79. If you currently purchase or lease interoffice transport within [state] from a company  
9 other than Qwest, please report which entity you currently obtain this service from, and also  
10 report the routes involved as well as number/type of transport facilities (e.g., copper, fiber, or  
11 radio) being purchased. Please report separately the quantity of DS0, DS1, DS3 optical carrier  
12 level (OC) and dark fiber connections you currently are purchasing, leasing or otherwise are  
13 being provided from non-Qwest entities.

14 **Sample Response Form**

15 State	16 Entity from which transport is obtained	17 Originating and terminating points of each transport facility leased	Type of transport leased (DS0,DS1, DS3, OC,dark fiber))	Quantity of transport connections leased, by type (as of 3/03)
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18  
19 80. Does [company] provide transport facilities on a wholesale basis to other carriers in  
20 [state]? If so, please list identify all such facilities that [company] has provided, including (1) the  
21 entity that obtained the transport, (2) the originating and terminating point of each facility, and  
22 (3) the type of facility (DS0, DS1, DS3, OC, dark fiber).  
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